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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**SUPPLEMENTAL DECLARATION OF
DEBORAH STEIN IN SUPPORT OF
FACEBOOK, INC.'S SUPPLEMENTAL
STATEMENT IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

1 I, Deborah Stein, hereby declare as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Facebook, Inc. ("Facebook") in the above-captioned matter. I am a member in good standing of the
4 State Bars of California and New York. I submit this declaration in support of Facebook's Statement
5 in Support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should
6 Be Sealed. I make this declaration on my own knowledge, and I would testify to the matters stated
7 herein under oath if called upon to do so.
8

9 2. Attached as **Exhibit 140-A, 141-A, and 142-A** is a true and correct **unredacted** copy
10 Plaintiff's Exhibits 140, 141, and 142.

11 3. Attached as **Exhibit 140-B, 141-B, and 142-B** is a true and correct **unredacted** copy
12 Plaintiff's Exhibits 140, 141, and 142.
13

14 4. Facebook proposes redacting confidential and competitively sensitive information re-
15 garding its business programs, strategies, decisions, and partners.¹ This information includes confi-
16 dential strategic discussions regarding Facebook's existing and potential future business models and
17 strategies. I am informed and believe that public disclosure of confidential information regarding Fa-
18 cebook's business models could allow Facebook's competitors to use this information developed at
19 Facebook's expense to improve or develop their own competing techniques, to Facebook's competitive
20 disadvantage. Additionally, I am informed and believe that public disclosure of confidential infor-
21 mation regarding Facebook's business strategies could allow Facebook's competitors to copy these
22 strategies, developed at Facebook's expense, to more effectively compete with Facebook.
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27 _____
28 ¹ Ex. 141 at 6.

1 5. Facebook also asks the Court to permanently seal certain confidential information re-
2 garding Facebook employees, specifically, employee email addresses., to protect the privacy of those
3 employees.²

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5
6 I declare under penalty of perjury under the laws of the United States of America that the fore-
7 going is true and correct.

8
9 Executed on September 2, 2022 in Los Angeles, California.

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11
12 /s/ Deborah Stein
13 Deborah Stein

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27 _____
28 ² Ex. 140 at 6; Ex. 142 at 1.